

IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

IN RE:

TERI G. GALARDI,

Reorganized Debtor.

CHAPTER 11

CASE NO. 22-50035-AEC

**THIRD & FINAL APPLICATION FOR COMPENSATION OF THE ATTORNEYS REPRESENTING
THE LIQUIDATING TRUSTEE OF THE GALARDI CREDITORS TRUST**

TO: THE HONORABLE AUSTIN E. CARTER
CHIEF JUDGE, U.S. BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

COMES NOW Jones & Walden LLC (the "Law Firm"), the attorneys for Thomas T. McClendon, as Liquidating Trustee of the Galardi Creditors Trust (the "Trustee"), and files this, its *Third & Final Application for Compensation of the Attorneys Representing the Liquidating Trustee of the Galardi Creditors Trust* (the "Application"), and in support thereof respectfully shows as follows:

1. On or about January 27, 2022, (the "Petition Date"), Teri G. Galardi (the "Debtor") filed a petition for relief under Chapter 11 of Title 11, United States Code, 11 U.S.C. §§ 101 et seq.
2. On April 10, 2023, Debtor filed an Amended Joint Chapter 11 Plan of Reorganization (Doc. No. 401) ("Plan"). The Plan provided for the Debtor's establishment of a liquidating trust for the benefit of the Holders of Class 8 Unsecured Claims and the execution of a Trust Agreement for the Galardi Creditors Trust ("Trust Agreement") to be in effect on the Effective Date of the Plan.
3. On April 14, 2023 (the "Appointment Date"), the Court entered the Order Confirming Joint Plan of Reorganization (Doc. No. 410) ("Confirmation Order") confirming the Plan, authorizing the execution of the Trust Agreement, and appointing the Trustee.
4. On April 25, 2023, Debtor and Trustee executed the Trust Agreement.
5. The Court has jurisdiction over this Application pursuant to Article 9.1(m) of the Plan (retention of jurisdiction over all matters regarding or related to the administration of the Galardi Creditors Trust) and Section 7.2 of the Trust Agreement.

6. Article 4.2 of the Trust Agreement authorizes the Trustee to employ attorneys and other professionals “whose services may be reasonably necessary or advisable... to advise or assist [Trustee] in the discharge of his duties... and to pay reasonable compensation” to such professionals out of the Trust Estate.

7. The Trustee has employed the Law Firm as Trustee’s counsel in this case. The Law Firm shows that it has represented the Trustee in this case since the Appointment Date.

8. The Law Firm has heretofore applied for interim compensation. The Law Firm was previously awarded fees in the amount of \$130,882.00 and out-of-pocket expenses in the amount of \$2,076.13 by Order dated February 28, 2024 (Doc. No. 781) (“First Interim Fee Order”) and fees in the amount of \$51,822.50 and out-of-pocket expenses in the amount of \$1,988.84 by Order dated June 26, 2024 (Doc. No. 901) (“Second Interim Fee Order”) for services rendered in connection with this case.

9. The Law Firm makes its Application for the allowance of compensation for professional services rendered to the Trustee for the period of time from April 25, 2024, through August 23, 2025 (“Application Period”), pursuant to Section 4.2 of the Trust Agreement, and to the extent applicable, 11 U.S.C. §§ 330 and 331. All services for which compensation is requested were performed on behalf of the Trust and not on behalf of any other party, creditor, persons or party in interest.

10. The Law Firm has not yet received payment from the Liquidating Trustee on these fees requested and brings this Application prior to payment to the Law Firm. The Law Firm has had numerous conferences with the Trustee, beneficiaries of the Trust, and other interested parties in reference to this case. The Law Firm has assisted the Trustee with making distributions to Holders of Class 8 Unsecured Claims and has performed many other services necessary and proper to the administration of the Trust.

11. The time expended by the Law Firm and the work performed by the Law Firm, for the period for which this Application is made, is duly itemized and set forth in Exhibit “A” which is attached hereto and incorporated herein by this reference.

12. The out-of-pocket expenses incurred by the Law Firm during the period for which this Application is made are duly itemized and set forth in Exhibit “A” which is attached hereto and

incorporated by this reference. The copy costs reflected on Exhibit "A" are charged at the rate of \$0.10 per page. The facsimile costs are charged at the rate of \$1.00 per outgoing page.

13. No agreement or understanding exists between the Law Firm and any other person for the sharing of compensation received or to be received for services rendered in connection with this case.

14. The Law Firm shows that it has expended a total of 255.0 hours in law firm time for the Application Period, in the total amount of \$73,8377.50. The Law Firm shows that it has incurred a total of \$2,777.91 in out-of-pocket expenses and advances in the course of such representation and has thereby earned a total of \$76,615.41. The Law Firm respectfully requests this Court to allow such sums as professional compensation and an expense of the Galardi Creditors Trust. The Law Firm requests that the Court award the Law Firm said amount and authorize the Liquidating Trustee to pay the Law Firm from the Galardi Creditor Trust \$76,615.41, which amount represents the requested fees and expenses.

15. The Law Firm seeks permission for the Liquidating Trustee to pay the amounts requested pursuant to this Application from the Trust's funds. The Law Firm requests that the Court authorize such compensation pursuant to Sections 4.2 and 7.6 of the Trust Agreement.

16. The Law Firm respectfully makes the following representations with regard to the 12-factor Johnson test to the extent the same is applicable:

- (a) Time and Labor Required: The Law Firm has expended a total of 255.0 law firm hours through August 23, 2025, at the following rates:

<u>Attorney(s)</u>	<u>Hourly Rate</u>
Leon S. Jones	\$475.00 – \$500.00
Mark D. Gensburg	\$375.00
Bethany L. Strain	\$300.00 – \$350.00
William Gooding	\$300.00
Tessa Vuncannon (Paralegal)	\$200.00 – \$250.00
Megan Cypher (Paralegal)	\$200.00 – \$250.00
Ellen Wooden (Paralegal)	\$200.00 – \$250.00
Daniela Manzo (Paralegal)	\$200.00 – \$250.00
Blake Dernus (Paralegal)	\$150.00

- (b) Novelty and Difficulty of Questions Presented: The Chapter 11 reorganization case involves the effort to resolve distribution disputes and make distributions on more than \$20 million in unsecured claims. The Law Firm shows that the novelty and difficulty of questions presented are more than those normally associated with a Chapter 11 bankruptcy case.
- (c) Skill Requisite to Perform Legal Services Properly: The Law Firm respectfully represents that it has the skill requisite to perform legal services heretofore rendered in a proper fashion.
- (d) The Preclusion of Other Employment Due to Acceptance of the Case: The Law Firm respectfully requests that the time expended by the Law Firm in connection with this case could have been devoted to matters being handled for other clients, but for the time demands placed upon the Law Firm by the Law Firm's involvement in this case.
- (e) Customary Fee for the Type of Services Rendered: The Law Firm shows that all fees requested by the Law Firm were generated by applying the Law Firm's normal hourly billing rate for the applicable date to the number of hours actually expended. Such itemization is detailed on Exhibit "A". The Law Firm respectfully represents that the customary compensation for the attorney services in connection with a bankruptcy case is upon an hourly billing basis.
- (f) Whether Fee is Fixed or Contingent: The Law Firm's charges are subject to being awarded by this Court under 11 U.S.C. § 330 and the Trust Agreement. The Fee is thus not truly fixed or contingent but has some characteristics of both.
- (g) Time Limitations Imposed by Client or Other Circumstances: The Law Firm shows that many of the services rendered have been performed under exacting time limitations imposed by the nature of the case.
- (h) Amount Involved and Results Obtained: The Law Firm is handling a large number of routine and complex Chapter 11 issues on behalf of the Trustee. The Court entered the

Confirmation Order on April 14, 2023. The Law Firm has represented the Trust since the Appointment Date.

- (i) Experience, Reputation, and Ability of Attorneys: The Law Firm respectfully represents that it has had a significant amount of experience within the areas involved in this representation.
- (j) Undesirability of the Case: The Law Firm respectfully represents that this factor is not normally applicable to a Chapter 11 case but that this case does include unusual challenges.
- (k) Nature and Length of Professional Relationship with the Client: The Law Firm shows that it has represented the Trustee in this case since the Appointment Date.
- (l) Awards in Similar Cases: The Law Firm respectfully represents that its Application is in keeping with similar applications for Chapter 11 compensation filed by attorneys in bankruptcy cases within this district.

17. The Law Firm requests that any order entered granting this Application, once entered, be effective immediately by providing that any 14-day stay is waived under Bankruptcy Rule 6004(h).

18. The Law Firm asks that the award requested pursuant to this Application be on a final basis. The Trustee is currently in the process of winding down the Galardi Creditors Trust and anticipates making a distribution to Holders of Class 8 Unsecured Claims after the Court's consideration of this Application and the motion regarding winddown procedures to be filed following this Application

WHEREFORE, the Law Firm prays that it be allowed Chapter 11 compensation as follows:

- (1) \$73,837.50 representing fees;
- (2) \$2,777.91 representing actual out-of-pocket expenses incurred on behalf of the Trustee; and

- (3) that the Liquidating Trustee be authorized and directed to pay the \$76,615.41 requested award to the Law Firm from the Galardi Creditors Trust on a final basis and any prior award be made final.

RESPECTFULLY SUBMITTED this 27th day of August, 2025.

JONES & WALDEN LLC

/s/ Leon S. Jones

Leon S. Jones

Georgia Bar No. 003980

699 Piedmont Avenue, NE

Atlanta, Georgia 30308

404-564-9300

ljones@joneswalden.com

Attorneys for Liquidating Trustee

EXHIBIT "A" FOLLOWS

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JONES & WALDEN, LLC
 Attorneys At Law

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Galardi Liquidating Trust
 c/o Tom McClendon, Trustee
 699 Piedmont Avenue NE
 Atlanta, GA 30308

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 August 26, 2025
 Account No: 2345.007
 Invoice No: 74019

Re: Attorneys for Liquidating Trustee

Fees

			Rate	Hours	
04/25/2024	EYW	Conference with TM re ledgers and revise same	200.00	0.70	140.00
	LSJ	Review "corrected" MRAS purportedly ink-signed by Jocelyn Johnson (.1); finalize fee applications (J&W, Trustee, and McNair Accountants) (.5); conference with TM re Motion for 3rd distribution and wind down procedures (.1); prepare same (1.9); final revisions on same (.2)	475.00	2.80	1,330.00
	TJV	Prepare/revise fee apps (.6); revise/finalize fee apps (.3); finalize response to request for final decree (.1); finalize, file and serve trustee, J&W, and accountant fee apps and email to calendar clerk re same (1.2)	200.00	1.20	240.00
	BD	Prepare 3rd motion (2.7); update spreadsheet numbers (0.1); conference with TTM re: 3rd motion (0.1); correspondence with Red Shield re: response to default (0.1); review numbers in 3rd motion (0.5); edit motion and check docket for fee app numbers, prepare notice of filing bank statements (0.7) edits and finalize motion, notice of filing and response (0.2)	150.00	4.70	705.00
04/26/2024	DM	Serve Notice of Hearing on fee apps and fee app	200.00	0.40	80.00
	BD	Prepare edit finalize Certificate of service on 3rd motion to disburse and serve out the same (2.9)	150.00	2.90	435.00
	BLS	conf. w/ TTM re: June 4th hearing	300.00	0.10	30.00
	LSJ	Review Red Shield email with Trustee re request for 100% distribution	475.00	0.10	47.50
04/30/2024	LSJ	Conference with TM re strategy for resolution of dispute with Red Shield over distribution	475.00	0.20	95.00
05/02/2024	DM	Send TM pandadoc link to sign Settlement Agreement	0.00	0.10	0.00
05/07/2024	BD	Telephone conference with M. Minnis re: 3rd distribution payment (0.1)	150.00	0.10	15.00
05/09/2024	BD	Review and update M. Bush's mailing address and resend returned mail (0.2)	0.00	0.20	0.00
05/12/2024	LSJ	Review docket and status re pending matters and calendar hearing (on third motion to disburse, professionals' fee applications, trustee's responses to application for final decree),			

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			Rate	Hours	
		review debtor's MOR and Trustee bank disclosure, review J. Johnson pleadings	475.00	0.30	142.50
05/14/2024	LSJ	Multiple conferences with TM re Red Shield, Kosachuk, and strategy	475.00	0.30	142.50
05/16/2024	BLS	conf. w/ TM re: J. Johnson response and Rule 11 letter; conf. w/ TM and pull law on parol evidence of vague or ambiguous terms (.2)	300.00	0.40	120.00
05/20/2024	TJV	Revise Rule 11 motion (.2); conference with TM re hearing continuation (.1); prepare notice of continued hearing on fee apps, distribution motion, and responses/objections to same (.9)	200.00	1.20	240.00
	LSJ	Conference with TM re Red Shield and Kosachuk email missives and strategy re same (.5); multiple calls with Kosachuk and conference with TM (.4)	475.00	0.90	427.50
	BLS	conf. w/ TM re: objections to distributions and drafting rule 11 letter and motion (.3); drafting rule 11 letter (.3); drafting rule 11 motion (2); conf. w/ TM re: non-creditor objection (.1); research non-creditor standing to object, 1109, party in interest standard, and person aggrieved standard (.6)	300.00	3.30	990.00
05/21/2024	BD	Prepare hearing notebooks and review docket (0.9)	0.00	0.90	0.00
	TJV	Finalize, file and serve notice of continued hearing (re fee apps & distribution motion)	0.00	0.40	0.00
05/22/2024	LSJ	Conference with TM re objections to distributions and strategy for hearing	475.00	0.40	190.00
05/23/2024	EYW	Research and review of stopped payments	0.00	0.20	0.00
05/28/2024	DM	Prepare fed ex labels for default letters, email	0.00	0.40	0.00
05/30/2024	LSJ	Conference with TM re case filings, prep of trustee's response brief, prepare for hearing	475.00	0.40	190.00
06/05/2024	BD	Review June 21 hearing notebook for TTM (0.4)	0.00	0.40	0.00
06/06/2024	BD	Telephone conference with B. Harris re: status of case (0.1)	150.00	0.10	15.00
06/11/2024	BLS	conf. w/ TMM re: certified copies and judicial notice; research judicial notice / evidence question and report back (.1)	300.00	0.20	60.00
06/12/2024	EYW	Review stop payments and update same	0.00	0.20	0.00
06/14/2024	BD	Telephone conference with Jenisee Long and TTM re: payment; telephone conference with MA re: Long payment; conference with TTM re: docs needed for Long payment; review Long distribution letter and prepare for TTM signature; send Long distribution letter to Long; telephone conference with Long re: letter completion; finalize and review with TTM long disbursement (0.6)	150.00	0.60	90.00
	BD	Review and edit TTM's replies to Kosachuk, Guernsey, Williams,			

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			Rate	Hours	
		Johnson, and Parker's objections to motions to disburse funds (2.5)	0.00	2.50	0.00
06/17/2024	BD	Review, edit, finalize and mail out replies to Kosachuk, Guernsey, Williams, Parker, and Johnson objections (5.6)	0.00	5.60	0.00
	TJV	Finalize and file replies to Red Shield Funding responses to distribution motion, trustee fee app, J&W fee app, and accountant fee app (.7); finalize and file replies to Kosachuk responses to distribution motion, trustee fee app, & J&W fee app (.5); finalize and file replies to Parker & Williams responses to distribution motion, trustee fee app, & J&W fee app and response to Johnson corrected MRAS (.6)	0.00	1.80	0.00
	LSJ	Review emails from parties (Red Shield, etc) re claims (.2); conference with TM re same and responses to pleadings (.2); prepare responsive pleadings to Red Shield objections (2.0); prepare responsive pleadings to Kosachuk objections (1.9)	475.00	4.30	2,042.50
	LSJ	Prepare responses to objections by Parker and Shaker Williams, prepare response to Jocelyn Johnson's Motion to Lift Stay (.3)	475.00	1.10	522.50
06/19/2024	LSJ	Conference with TM (prepare for hearing and evidentiary presentation)	475.00	0.90	427.50
06/20/2024	BD	Prepare for June 21 hearing, conferences with TTM, review exhibit and pleadings list, binders (7.2)	0.00	7.20	0.00
	LSJ	Review Motion to Set Aside Settlement Agreement filed by Kosachuk, Parker, Williams (.2); conference with TM (hearing prep) (.5)	475.00	0.70	332.50
06/21/2024	BD	Review docket for RSF transfers (0.3)	0.00	0.30	0.00
	BD	Review RSF's wire information for TTM (0.2)	0.00	0.20	0.00
	LSJ	Travel to and from Macon for hearing, attend hearing on 3rd Motion to Disburse and fee applications, numerous conferences with creditor counsel and opposing pro se litigants	475.00	11.00	5,225.00
06/24/2024	BD	Review hearing 6.21 audio (0.8)	0.00	0.80	0.00
	TJV	Prepare proposed orders on TM, J&W, and accountant fee apps (.5); revise/finalize and upload same (.3)	200.00	0.80	160.00
	LSJ	Email exchange with chambers (re setting hearing) (.1); email exchange (Kosachuk and Parker re order provisions) (.2); prepare orders (on fees and 3rd disbursement Motion) and conference with TM re same (1.6)	475.00	1.90	902.50
06/25/2024	LSJ	Conference with TM re Kosachuk dispute resolution (.3); revise/ prep of Consent Order on Kosachuk Motion and Consent on 3rd disbursement	475.00	1.00	475.00
06/26/2024	LSJ	Conference with TM re Guernsey and Kosachuk Settlements (.3); telephone conference with Parker and Kosachuk (with TM), conference with TM (debriefing) (.8); further edits on Kosachuk order, conference with TM re same/per Kosachuk's edit requests (.3)	475.00	1.40	665.00
06/27/2024	LSJ	Conference with TM re hearing request/strategy (.1) conference			

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			Rate	Hours	
		with TM, telephone conference with Kosachuk (.1); email exchanges (chambers) and opponents re setting hearing (.2); email Kosachuk, conference with T.M. (.3); email from Kosachuk text TM re same (Kosachuk position), conference call with TM re same (.4)	475.00	1.10	522.50
06/28/2024	DM	Prepare Notice of Filing Proposed Order, file	200.00	0.50	100.00
	LSJ	Email exchanges with Kosachuk (.2); conference with TM re same (and call with Kosachuk and prepare for Court hearing) (.1); telephone conference with Kosachuk (.2); attend telephonic court conference (.5); prepare and attend continuation of hearing (1.0); revise order per Kosachuk/ court hearing (.2)	475.00	2.20	1,045.00
	LSJ	Conference with TM re strategy and default Notice to Kosachuk	475.00	0.20	95.00
06/30/2024	LSJ	Email review	0.00	0.10	0.00
	LSJ	Review withdrawal filed pro se by Jamie Parker (re withdrawal of her portion of the Motion to Set Aside Settlement Agreement) (.1); review Trustee's Notice of Proposed Order (filed) (.1)	475.00	0.20	95.00
07/01/2024	DM	Print Order on Third Distribution Motion for LJ to review for upload; upload	0.00	0.20	0.00
07/02/2024	DM	Prepare edits on Default Letter to Kosachuk	0.00	0.20	0.00
	LSJ	Review docket (status of entry of disbursement order) (.1); prepare default demand to Kosachuk (.4)	475.00	0.50	237.50
07/03/2024	DM	Edit on Order on Third Distribution Motion, re-upload	0.00	0.10	0.00
	DM	Print default letter to Kosachuk for LSJ signature, check status of order on third distribution, prepare Fedex label, mail letter out and email	0.00	0.30	0.00
	LSJ	Telephone conference with chambers, revise order	475.00	0.20	95.00
07/04/2024	LSJ	Review docket and all updates to calendar events (appeal deadline on fee orders), review entered orders (denial of Jocelyn Johnson Stay Relief Motion because she testified that she did not make the Motion), further review of J. Cater's lengthy order which denies Jocelyn Johnson's Motion for Rehearing on Order Disallowing her claim, further review of Kosachuk's Motion to Set Aside Settlement Agreement (based on allegations that Red Shield is an entity and required counsel), further review of J. Carter's lengthy order (denial of Kosachuk Motion for Stay Pending Appeal), further review of J. Carter's lengthy detailed order (denial of Kosachuk Motion for Rehearing) (1.3); research re wind down of liquidating trust (.1)	475.00	1.40	665.00
	LSJ	Review entered order on Trustee's Third Motion to Disburse, email TM re same and issuance of default demand to Kosachuk (.2); review docket and Court Notice of Hearing on Red Shield Motion for Contempt as to Gabbe, as to Wright/Hughes/Brooks, as to Walker/Akemon and Kosachuk's Motion to Reconsider Compromise Order (.1)	475.00	0.30	142.50
07/07/2024	LSJ	Lengthy email review (of past and pending email traffic between TM, chambers, and opposing creditors Red Shield and			

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			Rate	Hours	
		Kosachuk to confirm default demand and action items)	475.00	0.40	190.00
07/08/2024	LSJ	Briefing with TM re communications with creditors inquiring about distributions (and strategy re same)	475.00	0.20	95.00
	BD	Telephone conference with R. Jones and B. Harris re: case update (0.2); prepare email/letter to creditors (0.6)	150.00	0.80	120.00
07/10/2024	LSJ	Conference with TM re Red Shield approachment and hearing re-set	475.00	0.20	95.00
07/11/2024	LSJ	Conference with TM re upcoming matters	475.00	0.20	95.00
	LSJ	Review Guernsey's Amended Notice of Appeal (filed 7/11/24) and original Notice of Appeal filed 7/10/24, review Guernsey's withdrawal of his Motion to Hold Gabbe in Contempt (.2); review clerk's transmittal of appeal to USDC, review USDC acknowledgement and assignment of appeal case, review clerk letter to Guernsey re appeal requirements (.2)	475.00	0.40	190.00
07/12/2024	BD	Prepare letter and FedEx to Accountant for payment (0.4)	0.00	0.40	0.00
	LSJ	Conference with TM re appeal and prep for hearing (.2); call and email Guernsey (.1)	475.00	0.30	142.50
07/13/2024	LSJ	Email exchange / review (appeal) and scheduling of hearing(s)	475.00	0.20	95.00
07/15/2024	BD	Correspondence to S. Bain re: update and draft new update letter for creditors (0.2); conference with TTM re: update (0.1); telephone conference with R. Jones re: case status (0.1)	150.00	0.30	45.00
	LSJ	Review Kosachuk Notice of Cross-Appeal and clerk's notice to Kosachuk of requirement to pay appeal fee within 7 days, review Kosachuk's adoption of Red Shield's Motions for Contempt, review Kosachuk's Motion to Register as ECF filer, review and calendar Motion to Set Aside Joint Dismissal filed by Shakir Williams in the A.P.	475.00	0.40	190.00
	LSJ	Review the Amended Motion to Set Aside the Settlement Agreement filed by Kosachuk (with blue ink signature of Shakir Williams but perhaps cut and paste and with no signature of Jammie Parker) (filed July 15) (.2); review Astrid Gabbe Notice of Appeal of Third Distribution Order (.1); review Kosachuk Motion for Stay pending appeal (.1); review Notice of Termination of Lou McBryan as debtor counsel (.1)	475.00	0.50	237.50
	LSJ	Review BK Court's order setting 7/25/24 hearing on Motion to Set Aside A.P. Dismissal filed (purportedly) by Kosachuk, Shakir Williams and Jammie Parker, calendar same, review Clerk re assignment of A.P. from J. Smith to J. Carter, review order provisionally striking Jammie Parker from Motion due to lack of her signature and noting that Kosachuk signature appeared on duplicate filing (.2)	475.00	0.20	95.00
07/16/2024	TJV	Prepare settlement agreement default letter to Gabbe (.3); prepare motion for contempt re settlement agreement against Guernsey, Kosachuk, Parker, & Williams (.8)	200.00	1.10	220.00
	LSJ	Conference with TM and A. Dudley (prep for contempt hearings) (.7); review Red Shield withdrawal of Motion to Hold Gabbe in			

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			Rate	Hours	
		Contempt, review Red Shield Notice of Appeal (.1); review Notice from clerk of transmittal of appeal and clerk assignment (.1)	475.00	0.90	427.50
	BD	Correspondence to L. Fenner re case update (0.1); telephone conference with L. Simmons re: update (0.1)	150.00	0.20	30.00
07/17/2024	TJV	Further prep of motion for contempt & to enforce settlement agreement	200.00	1.30	260.00
	LSJ	Receipt and review of emails and purported "subpoenas" from Kosachuk and Guernsey	475.00	0.20	95.00
	LSJ	Review multiple email exchanges re subpoenas by Kosachuk and Guernsey (Terry, TM), conference with TM re debtor response to same (.3)	475.00	0.30	142.50
07/18/2024	LSJ	Review Red Shield emails and Kosachuk emails and Terry/McBryan	475.00	0.20	95.00
07/19/2024	DM	Print Default Letter to Gabbe on letterhead for TM signature	0.00	0.10	0.00
	BLS	research res judicata in contested matters and add case law to response	300.00	1.50	450.00
	BLS	edits to response in opposition and prepare LSJ review	300.00	0.30	90.00
	BD	Conference with TTM re: case update letter to clients (0.1); prepare email to clients (0.3); respond to creditor emails (0.2); LSJ notebook (0.1)	150.00	0.70	105.00
	BD	Prepare Notice Letter to A. Gabbe email and FedEx (0.3)	0.00	0.30	0.00
	LSJ	Conference with TM, prepare memo to class 8 creditor re distribution (.2); conference with TM (hearing prep and analysis of appeal) (.3)	475.00	0.50	237.50
07/20/2024	LSJ	Review BK order re failure to provide wet ink signature of Jamie Parker (on Kosachuk's filing of Motion to Set Aside Settlement Agreement) (.2); review BK Court order striking Kosachuk affidavit filed in support of Motion to Set Aside Settlement Agreement based on lack of wet ink signature (.1); review Guernsey usps service (certificate of service) on subpoena to Dean Fuchs (.1); review USDC docket (J. Treadwell) re all filings in appeal by Guernsey, Kosachuk (.1); review BK clerk's 7-18-24 notice to appellants (Guernsey and Kosachuk) of appeal designation requirements, review clerk's notice of same as to "cross appeal" by Kosachuk, review J. Treadwell assignment (.2)	475.00	0.60	285.00
07/21/2024	LSJ	Review Red Shield emails and subpoenas to Galadi, TM and LSJ (.1); prepare Motion to Hold Shakir Williams in contempt (.7); prepare response to Guernsey Motion for Contempt Against Hughes and Brooks, prepare response to Motion to Set Aside Settlement Order filed by Kosachuk, Parker and Williams, prepare Response to Guernsey's Motion for Contempt Against Marissa Walker and Mutepe Akemon, prepare Motion for Contempt Against Kosachuk (2.5)	475.00	3.30	1,567.50
07/22/2024	BD	Correspondence to M. Bush and Leahong re update (0.2)	150.00	0.20	30.00
	TJV	Revise response to motion to set aside (.8); revise Williams motion for contempt (.2); revise Kosachuk motion for contempt			

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			Rate	Hours	
		(.8); revise response to Guernsey's motion for contempt against Wright, Hughes, & Brooks (.2); revise response to Guernsey's motion for contempt against Walker & Akemon (.1); finalize 2 motions for contempt and 3 responses in opposition (.2); file and serve same (.8)	200.00	3.10	620.00
	LSJ	Conference with TM re filing/ finalizing pleadings (.1); prepare for trial (.7)	475.00	0.80	380.00
	LSJ	Trial prep, prepare timeline, cross exam of Kosachuk, prepare TM re cross (.7); review Kosachuk Motion for Continuance	475.00	0.70	332.50
07/23/2024	LSJ	Review objection by pro se creditor Williams to Kosachuk's Motion for Contempt (.1); review docket and responses filed by the Trustee for the 7-25-24 hearing (.1); review Kosachuk's Motion for Continuance of 7-25-24 hearing due to Chris Terry miscommunication, review Kosachuk Notice of Compliance (filing of original affidavit), review filing of Jamie Parker wet ink signature (Motion to Set Aside Settlement) (.2); review clerk's letter (Courts denial of electronic signature privileges to Kosachuk), review docket notice setting hearing on Octavia Whittaker objection (.2); review Kosachuk and Parker filings in adversary, review adversary docket (Gabbe v. McClendon) Motion to Set Aside Judgement, order setting hearing, calendar same (.2); review Lou McBryan response (email) to Guernsey objecting to Guernsey's invalid subpoena to debtor Galardi (.1); review Dean Fuchs letter response to Guernsey re Red Shield's non-service of any effective subpoena (.1); conference with TM re Kosachuk subpoena (defective but compliance) (.2); review notices from BK clerk re appeal and deadlines (.1); prepare for trial (.1); review entered order granting Kosachuk's Motion for Continuance on his Motion to Set Aside Settlement Agreement (.1); conference with TM re trial prep (.2)	475.00	1.70	807.50
	EYW	Reconcile account ledgers; prepare UST report and exhibits	200.00	3.00	600.00
	TJV	Prepare Parker motion for contempt as to settlement agreement	200.00	0.20	40.00
07/24/2024	DM	Redact wiring instructions info	0.00	0.40	0.00
	LSJ	Prepare for hearing on contempt motions filed by Guernsey (with purported Joinder by Kosachuk) (.2); prepare for hearing on Kosachuk Motion to Set Aside Settlement Agreement (1.0); prepare timeline re same (.2)	475.00	1.40	665.00
	LSJ	Review response to Red Shield Motion for Contempt filed by Akemon and Marissa Walker (combined with objection to Kosachuk Joinder)	475.00	0.20	95.00
07/25/2024	LSJ	Travel to Macon for hearing on two Motions for Contempt filed by Guernsey d/b/a Red Shield (1.3); attend hearings including conferences with creditor counsel (Akemon and Dudley) representing respondent creditors to Guernsey contempt motion (prep and debriefing post-hearing) (5.0); travel from Macon to Atlanta (1.5)	475.00	7.80	3,705.00
07/26/2024	BD	Prepare docket for TTM re: Guernsey appeal (0.3)	0.00	0.30	0.00
	LSJ	Conference with TM re trust insurance	475.00	0.10	47.50

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Re: Attorneys for Liquidating Trustee

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			Rate	Hours	
07/30/2024	BD	Prepare Guernsey designation documents (0.8)	150.00	0.80	120.00
07/31/2024	BD	Prepare Trustee report to UST, edits, review and prepare ledgers and assets (1.1)	150.00	1.10	165.00
08/01/2024	LSJ	Review Gabbe submission (late filed) of issues on appeal (.1); telephone conference with Kosachuk (.1); conference call with Dudley and Akemon re Kosachuk A.P. and pending motions (.7); conference with TM re strategy on same and proposed term sheet (.2)	475.00	1.10	522.50
	LSJ	Email exchange / review (Kosachuk)	475.00	0.10	47.50
08/02/2024	EYW	Review UST status report exhibits and finalize same	200.00	0.50	100.00
	BD	Telephone conference with B. Harris re: appeals, edit Trustee report and conference with TTM and EW re same (0.4)	150.00	0.40	60.00
	LSJ	Conference with TM, prepare term sheet re Kosachuk settlement	475.00	0.30	142.50
	TJV	Prepare default letter to Kosachuk	200.00	0.90	180.00
08/06/2024	BD	Prepare Guernsey designation for TTM and telephone conference with M. Minnis re: case update (1.5)	150.00	1.50	225.00
	LSJ	Review entered order denying Kosachuk's Motion for Stay Pending Appeal (.1); review entered order denying Kosachuk's Motion for Stay of Order and adjudicating contempt motions (.1)	475.00	0.20	95.00
08/08/2024	LSJ	Conference with TM; prepare designation of issues on appeal	475.00	0.10	47.50
08/10/2024	LSJ	Review trustee McClendon's designation of record and statement of issues on appeal	475.00	0.10	47.50
08/12/2024	BD	Edit and review Amended Designation form; conference with TTM; file and serve on parties (1.2)	150.00	1.20	180.00
	LSJ	Email exchange/ review (Dudley default notices to Kosachuk) and status of appeal	475.00	0.10	47.50
	LSJ	Review/ prepare Trustee's designation of issues and record on appeal (.1); review BK Court's order requiring Kosachuk to provide wet ink signature on his designation of record for appeal (.1)	475.00	0.20	95.00
08/13/2024	LSJ	Conference with TM, email exchange/ review re scheduling hearing	475.00	0.10	47.50
08/15/2024	LSJ	Email exchanges (review Chris Kosachuk defaults and notices and Kosachuk responses)	475.00	0.10	47.50
08/17/2024	LSJ	Review Kosachuk filing of wet ink signature on appeal designations to effect compliance with BK Court's show cause order	475.00	0.10	47.50
08/19/2024	WMG	Legal Research for Appeal	0.00	1.40	0.00
08/20/2024	LSJ	Review transcript re appeals (multiple hearings)	475.00	0.10	47.50
08/21/2024	BD	Review bills and calculate time for parties; conference with TTM			

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			Rate	Hours	
	LSJ	re same (0.4)	150.00	0.40	60.00
	LSJ	Conference with TM (prepare renewed motion for contempt against Kosachuk and prepare Motion to Determine Kosachuk a Vexatious Litigant)	475.00	0.40	190.00
08/22/2024	WMG	Drafted Memorandum for Vexatious Litigation Motion	0.00	3.30	0.00
	BD	Prepare and finalize billing for letter (0.2); prepare for LSJ's review (0.1)	0.00	0.30	0.00
08/23/2024	BD	Review docket, pull documents for WG and PACER search (0.5)	0.00	0.50	0.00
	WMG	Drafted Vexatious Litigant Motion	0.00	0.70	0.00
08/26/2024	TJV	Finalize and issue default letter to Kosachuk	200.00	0.20	40.00
08/27/2024	LSJ	Conference with TM re Kosachuk A.P. and deadline (.1); review transmittal of appeal to District Court (.1); review USDC docket	475.00	0.20	95.00
08/28/2024	WMG	Research for Motion to Dismiss	0.00	0.50	0.00
	BD	Review Vexatious Litigant Motion (0.5)	0.00	0.50	0.00
	LSJ	Review USDC letter regarding briefing schedule	475.00	0.10	47.50
08/29/2024	WMG	Research for Motion to Dismiss	0.00	1.10	0.00
	LSJ	Conference with TM re Motion to Dismiss Kosachuk complaint	0.00	0.10	0.00
09/10/2024	LSJ	Conference with TM email from Kosachuk with amended complaint electing non Gabbe defendants	475.00	0.10	47.50
09/11/2024	LSJ	Email from Kosachuk, review amended complaint propounded by Kosachuk	475.00	0.10	47.50
09/24/2024	TJV	Prepare response to motion to set aside order in AP 23-5024	200.00	0.60	120.00
09/25/2024	LSJ	Conference with TM re three headed dispute (.3); conference with TM re Kosachuk purported settlement proposal to creditors who have already been bound and for which he is serving as purported (lawyer) representative (.1)	475.00	0.40	190.00
09/26/2024	LSJ	Conference with TM re evidence of damages for contempt motion against Kosachuk (.1); review emails (Kosachuk and debtor counsel) attempted to leverage payoff of claimants he is attempting to represent (.1); conference with TM re strategy (.4)	475.00	0.60	285.00
09/27/2024	BD	Prepare billing spreadsheets for October 1 hearing for Kosachuk, Parker, Williams (Trustee's time and J&W time)	150.00	3.50	525.00
	LSJ	Review Trustee Response Brief filed in Gabbe A.P. (Response to Kosachuk Motion to Set Aside) (.1); conference with TM (.1); conference with TM re resolution with Guernsey and terms for same (.2); telephone conference with TM re same (.1)	475.00	0.50	237.50
09/30/2024	LSJ	Conference with TM, review Kosachuk and TM email exchange (.1); conference with TM on strategy and logistics on getting appeal dismissed (.2)	475.00	0.30	142.50
	LSJ	Email exchanges with landlord attorney, review landlord			

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			Rate	Hours	
		agreement edits, conference with TM (.2); conference with TM re Guernsey settlement and Kosachuk gasps for deal (telephone conference with Parker) (.2); conference with TM re Kosachuk terms (.2); further email exchanges and conference with TM re resolution with Kosachuk (.2); review Kosachuk emails (withdrawals and dismissals) and conference with TM re re-setting of contempt motion (.2)	475.00	1.00	475.00
10/01/2024	LSJ	Email exchange review (court chambers, TM and Kosachuk) re filing Kosachuk withdrawals and removal of matters from hearing calendar	475.00	0.10	47.50
10/02/2024	DM	Edits on Confidential Settlement Agreement per Leon edits	0.00	0.40	0.00
	LSJ	Prepare Settlement Agreement between Guernsey and Trustee	475.00	0.60	285.00
10/03/2024	LSJ	Review BK Court Notice of Disposition, calendar on pending motions, review Gabbe appeal brief (.1); review email exchange (Chris Terry and DeCampo) (.1); email exchange review (TM and Kosachuk re resolution and withdrawals) (.1)	475.00	0.30	142.50
	LSJ	Review docket filing clerk's receipt of Kosachuk's Motion of his motion with wet ink signatures of Parker and Williams to be provided	475.00	0.10	47.50
	MSC	Telephone conference with USDC financial specialist re potential outstanding fees for appeal case	200.00	0.20	40.00
10/04/2024	DM	Finalize Guernsey Settlement Agreement, send via PandaDoc	0.00	0.20	0.00
	LSJ	Conference with TM (prepare pleadings to dismiss appeal) (.2); review USDC docket and dismissal of cross appeal filed by Kosachuk (in Guernsey appeal) review ghost-written appeal brief fraudulently filed by third party purportedly by Guernsey (.3)	475.00	0.50	237.50
	LSJ	Review BK Court's memorandum decision (denial of Guernsey Motion to Hold Brooks parties in contempt) (.3); review Court's memorandum opinion (denial of Guernsey Motion for Contempt Against Akemon and Walker) (.2)	475.00	0.50	237.50
10/07/2024	LSJ	Review TM email to Gabbe attorney (.1); review Gabbe appeal brief at USDC (.2)	475.00	0.30	142.50
	TJV	Finalize Motion to Dismiss Guernsey appeal and circulate same for execution (.1); receipt and review of Guernsey signed settlement agreement and Motion to Dismiss appeal (.1); finalize revised Motion to Dismiss and re-circulate for signature (.1)	200.00	0.30	60.00
10/08/2024	LSJ	Conference with TM re brief against Gabbe appeal and Motion for Contempt against Gabbe	475.00	0.20	95.00
10/09/2024	WMG	Conducted Legal Research on Waiver of Appeals	300.00	2.30	690.00
	TJV	Prepare motion for contempt against Gabbe re filing of appeal (.5); finalize, file and serve joint motion to dismiss Guernsey appeal (.3)	200.00	0.80	160.00
	LSJ	Review USDC docket (Kosachuk dismissal of cross appeal)	475.00	0.10	47.50
10/10/2024	BLS	conf w. TM re: Gabbe friv appeal (.1); research law on frivolous appeals and application to bankruptcy (.2)	300.00	0.30	90.00

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			Rate	Hours	
10/11/2024	BD	Review and edit Astrid Appeal Brief (0.9)	0.00	0.90	0.00
10/14/2024	BLS	conf. w/ TM re: Gabbe appeal (.1); working on Gabbe appeal motion (.3); call w/ TM re: same (.1)	300.00	0.50	150.00
10/15/2024	LSJ	Conference with TM re dismissal of Guernsey/Kosachuk appeal and briefing on Gabbe appeal	475.00	0.10	47.50
	BLS	work on frivolous appeal motion (.3)	300.00	0.30	90.00
10/17/2024	BLS	research standard for frivolous appeal (.8); research frivolous appeals in BK cases under 8020 (.5); research case law on an appeal being frivolous for lack of standing (.5); research caselaw on frivolous appeals for violation of a prior contract or settlement agreement (.6); further research on elements of frivolous appeal (.6); conf. w/ TM re: factual questions (.1); draft District Court Motion for sanctions against Gabbe (1.3)	300.00	4.40	1,320.00
10/18/2024	DM	Edits on Gabbe Appeal - Motion for Sanctions	0.00	0.40	0.00
	BLS	final edits to Gabbe Motion for Sanctions (.2); conf. w/ TM re: Motion (.1); research and update Galardi Motion re: apportionment of fees between client and counsel (.6); research misrepresenting facts and record as frivolous appeal and add section on misrepresentation of the record by failing to disclose Settlement Agreement (.7); final edits of updated draft (.2); conf. w/ TM re: relief requested and final Motion (.1)	300.00	1.90	570.00
10/19/2024	LSJ	Email exchange review (Kosachuk and TM re his threats)	475.00	0.10	47.50
10/21/2024	DM	Edits on Gabbe Appeal Brief, Motion for Contempt, Motion for Sanctions, Appendix	200.00	0.50	100.00
	TJV	Prepare Gabbe appeal appendix (1.0); revise/finalize & file appellee brief with appendix and motion for sanctions in Gabbe appeal (1.2); finalize, file and serve motion for contempt against Gabbe in BK case (.2)	200.00	2.40	480.00
	LSJ	Prepare trustee appeal brief, motion for sanctions for frivolous appeal, and motion for contempt	475.00	1.40	665.00
10/24/2024	EYW	Reconcile bank accounts; prepare Sixth Status Report	200.00	1.60	320.00
	TJV	Revise motion to determine Kosachuk as vexatious litigant	0.00	0.40	0.00
10/25/2024	LSJ	Review USDC docket and pleadings (trustee appeal brief and motion for sanctions filed)	475.00	0.10	47.50
10/29/2024	TJV	Prepare Notice of Hearing on Gabbe motion for contempt	200.00	0.20	40.00
	LSJ	Conference with TM re strategy (Gabbe appeal) and Kosachuk frivolous demand (.1); review Kosachuk contempt demand against the trustee (.1)	475.00	0.20	95.00
10/30/2024	LSJ	Review clerk memo to Parker and Williams re original signatures Notice of Hearing on motion to reconsider (DN 1017) (.1); conference with TM Guernsey email (review) (.1)	475.00	0.20	95.00
	TJV	Finalize, file and serve Notice of Hearing on Gabbe contempt			

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			Rate	Hours	
		motion	200.00	0.10	20.00
10/31/2024	TJV	Prepare, file and serve amended Notice of Hearing on Gabbe contempt motion	200.00	0.10	20.00
11/05/2024	LSJ	Conference with TM re strategy to obtain dismissal of Gabbe appeal and Gabbe attorney's incompetency	475.00	0.10	47.50
11/06/2024	BD	Telephone conference with M. Williams re status update, telephone conference with M. Ward re contact info update and status update, and correspondence with B. Walker re status update (0.4)	150.00	0.40	60.00
11/18/2024	LSJ	Email from Kosachuk re calendared hearing, conference with TM, email to chambers	475.00	0.20	95.00
11/19/2024	LSJ	Review J. Carter's entered show cause order and calendar hearing	475.00	0.10	47.50
11/25/2024	MSC	Telephone call with creditor (M. Taylor) re current contact information change	200.00	0.10	20.00
11/26/2024	LSJ	Review and calendar notice of hearing for Dec 2	475.00	0.10	47.50
11/27/2024	LSJ	Conference with TM re contempt motion hearing on Monday	475.00	0.20	95.00
12/02/2024	MSC	Review docket for TTM re notice of appearance for counsel	0.00	0.10	0.00
	LSJ	Email exchanges with chambers, TM, and Gabbe re Gabbe request for continuance, review Gabbe Motion for Continuance (.2); conference with TM re same (.1); review Gabbe Brief (.1); conference with TM re scheduling hearing and strategy (.1)	475.00	0.40	190.00
	LSJ	Review Court's entered order granting Gabbe's Motion for Continuance (setting hearing on 12-2-24) (.1); review Gabbe's response to motion for sanctions (.1)	475.00	0.20	95.00
12/03/2024	LSJ	Email to creditor counsel re pending hearings, calendar same	475.00	0.10	47.50
12/05/2024	LSJ	Email exchange review (Web X attendance) and Kosachuk Motion to Amend Complaint	475.00	0.10	47.50
12/06/2024	LSJ	Conference with TM re briefing	475.00	0.10	47.50
12/09/2024	LSJ	Conference with TM re strategy on Kosachuk 9011 sanctions and contempt motion	500.00	0.20	100.00
12/10/2024	TJV	Prepare withdrawal notices of 3 contempt motions (.2); finalize and file same (.1)	200.00	0.30	60.00
12/11/2024	EYW	Receipt and review of bank statements and reconcile same	200.00	0.30	60.00
	LSJ	Review order entered dismissing Parker and Williams from Motion based on failure to appear at show cause hearing	475.00	0.10	47.50
12/12/2024	TJV	Prepare default letter to Kosachuk re AP filings	200.00	0.20	40.00

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			Rate	Hours	
	BLS	Review Gabbe Response to motion for sanctions and conf. w/ TM re: same (.4)	300.00	0.40	120.00
12/13/2024	TJV	Prepare Rule 11 letter (.2); prepare Rule 11 motion (1.1); revise Kosachuk default letter, Rule 11 letter, and response to motion for leave to amend complaint in AP (.3); finalize, file and serve response to motion for leave and finalize & issue default letter and Rule 11 letter (.5)	200.00	2.10	420.00
	LSJ	Review and calendar Court's Notice of Hearing on Kosachuk's Motion to Amend Complaint (set 1-21-25); (.1); review Court's entered order dismissing Motion by Parker and Williams to Set Aside Consent Order (based on lack of prosecution) (.1); review Trustee McClendon special appearance and Brief in opposition to Kosachuk's Motion for Leave to Amend Complaint (.1); review Trustee;s withdrawal of Motion for Contempt (against Kosachuk), and withdrawal as to Parker, and as to Williams, review Dudley's withdrawal of his Motion to Hold Kosachuk in Contempt (.1); review Gabbe filing in USDC (opposition to Trustee's Motion for Sanctions for Frivolous Appeal) (.1)	475.00	0.50	237.50
	BLS	conf. w/ TM re: drafting reply to Gabbe response to motion for sanctions (.1); draft reply to response to motion for sanctions (2.4)	300.00	2.50	750.00
12/14/2024	LSJ	Review and calendar entered order setting hearing on Kosachuk Motion to Amend Complaint	475.00	0.10	47.50
12/16/2024	LSJ	Review TM correspondence to Gabbe re Gabbe default notice to trustee	475.00	0.10	47.50
12/17/2024	DM	Review email from July 19, forward to TM (letter to Astrid)	200.00	0.10	20.00
	LSJ	Conference with TM re contempt hearing prep (Gabbe)	475.00	0.10	47.50
	BLS	call from TM re: determining total payments to Gabbe, review distribution records and calculate total Gabbe payout, and conf. w/ TM re: same (.4); draft Gabbe reply (review docket for records and compile accurate timeline of facts) (3.8); conf. w/ TM re: Gabbe Reply (.2)	300.00	4.30	1,290.00
12/18/2024	BD	Multiple correspondences with creditor Deleston re case update(0.2)	150.00	0.20	30.00
	BLS	Draft Gabbe appeal reply (3.3)	300.00	3.30	990.00
12/19/2024	LSJ	Conference with TM re: (.1) Gabbe's request and anticipated "no show" at the hearing on her contempt (.2); Gabbe appeal with Rule 11 sanction pending Kosachuk Motion to Amend Complaint with Trustee's contempt Motion and Rule 11 Motion as cross-actions, and strategy on same	475.00	0.70	332.50
	LSJ	Further conference with TM re same	475.00	0.10	47.50
	TJV	Prepare reset Notice of Hearing on Gabbe contempt motion (.2); finalize, file and serve same (.1)	200.00	0.30	60.00
	BLS	drafting Gabbe Reply and conf. w/ TM re: Gabbe illness and hearing rescheduling	300.00	2.00	600.00
12/23/2024	DM	Edits on Gabbe Appeal Reply to Response to Motion for			

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		Sanction; finalize and file	200.00	0.30	60.00
	BD	Telephone conference with R. Jones and correspondence with L. Fenner re case update (0.2)	150.00	0.20	30.00
	BLS	edits to Gabbe Reply and prepare with comments for TM review (.8)	300.00	0.80	240.00
	BLS	find and add transcript cites for TM (.3); conf. w/ TM re: RoA (.1); make final changes, format, final review, and file (.2)	300.00	0.60	180.00
12/26/2024	LSJ	Review court docket notice setting hearing on Gabbe's deposition in opposition (Jan 21 hearing)	475.00	0.10	47.50
01/05/2025	LSJ	Review and calendar order resting (to Jan 21) hearing on 3 matters in Kosachuk adversary	500.00	0.10	50.00
01/09/2025	EYW	Reconcile accounts and process 2024 tax documents to CPA	250.00	0.50	125.00
	BD	Telephone conference with creditor M. Taylor re tax form for 2025 and update mailing address (0.2)	150.00	0.20	30.00
	BD	Telephone conference with T. Thompson re update on case (0.1)	150.00	0.10	15.00
	BD	Communicate with creditor J. Ridley re update on case (0.1)	150.00	0.10	15.00
	BD	Communication with creditor M. Kahey re case update on distribution (0.1)	150.00	0.10	15.00
	BD	Communication with creditor D. Deleston re case update on distribution (0.1)	150.00	0.10	15.00
01/13/2025	MDG	Rule 9011 research concerning the safe harbor time period.	375.00	0.90	337.50
	LSJ	Review Kosachuk amended complaint and amended motion to amend complaint (deleting trustee McClendon claims and as defendant)	500.00	0.10	50.00
	LSJ	Conference with TM re Kosachuk Rule 11 demand vesting and setting hearing on Kosachuk default	500.00	0.10	50.00
	TJV	Prepare Kosachuk motion to compel in AP (.4); finalize rule 11 motion and prepare motion to expedite re same and motion to compel (.3); revise/finalize and file motion to compel, motion for sanctions, and motion to expedite (.4); prepare and upload order granting expedited hearing (.2)	250.00	1.30	325.00
01/14/2025	LSJ	Conference with TM re sanctions against Kosachuk	500.00	0.10	50.00
	TJV	Prepare service of order to expedite, motion to compel, and motion for sanctions and file certificate of service re same	250.00	0.50	125.00
01/15/2025	BD	Review all creditor distribution payments made in 2024 for creditors' 1099s (2.4)	150.00	2.40	360.00
01/16/2025	BD	Finish 1099 review for creditor 2024 payments and conf with TTM re same (0.5)	150.00	0.50	75.00
	LSJ	Review Kosachuk's filed pleading now of record (amended Motion to Amend Complaint deleting Trustee McClendon as defendant), review Kosachuk email re same	500.00	0.10	50.00
01/17/2025	TJV	Finalize, file and serve supplement to motion for sanctions against Kosachuk	250.00	0.30	75.00
	LSJ	Email exchanges (chambers, Kosachuk, trustee) re cancellation of 1-21-25 hearing due to inclement weather, conference with			

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			Rate	Hours	
	LSJ	TM re same	500.00	0.10	50.00
	LSJ	Review and calendar entered order continuing Jan 21 hearings due to inclement weather (.1); prepare supplement to motion for contempt against Kosachuk (.1)	500.00	0.20	100.00
01/23/2025	MSC	Email B. Walker re 1099	250.00	0.10	25.00
	BD	Telephone conference with M. Taylor re status update and 1099 forms (0.1)	150.00	0.10	15.00
	LSJ	Conference with TM email exchanges with chambers and parties re hearing re-setting (due to weather)	500.00	0.10	50.00
01/24/2025	LSJ	Email exchanges (chambers and counsel) confirming scheduling of fee 21 hearings	500.00	0.10	50.00
01/27/2025	EYW	Update files and communication with S. Rumford	250.00	0.10	25.00
01/28/2025	BD	Prepare, review, and send out creditors 1099s, multiple comms with creditors (6.8)	0.00	6.80	0.00
01/29/2025	BD	Prepare and finish 1099 forms to creditors; multiple correspondences with multiple creditors re 1099 and mailing addresses (0.9)	0.00	0.90	0.00
	LSJ	Conference with TM, email exchange review (Kosachuk) requesting trustee's deposition	500.00	0.20	100.00
01/30/2025	BD	Multiple communications with creditors re 1099s (0.2)	150.00	0.20	30.00
01/31/2025	BD	Multiple correspondences with creditors re 1099 form (0.3)	150.00	0.30	45.00
02/01/2025	LSJ	Review Kosachuk's motion to withdraw reference filed in BK court re adversary (Kosachuk v. Gabbe)	500.00	0.10	50.00
02/06/2025	BD	Multiple communications with B. Harris re 1099s and distributions and M. Bush re same (0.5)	150.00	0.50	75.00
	LSJ	Review and calendar order setting in person contempt hearing (Trustee v Kosachuk) for Feb 21	500.00	0.10	50.00
02/13/2025	BD	Multiple correspondences to creditors re 1099s (K. Jackson, S. Bain, and Q. Sanders) and resend S. Bain's 1099 form to new address (0.6)	150.00	0.60	90.00
	LSJ	Prepare Motion for Contempt against Kosachuk, Motion to Expedite Hearing on same and order entered granting expedited hearing, calendar Feb 21 expedited hearing	500.00	0.20	100.00
02/15/2025	LSJ	Review letter by bankruptcy clerk to Kosachuk notification of failure to pay filing fee on motion to withdraw reference and same to be held in abeyance	500.00	0.10	50.00
02/18/2025	LSJ	Review Kosachuk Motion for continuance and conference with TM re same, email exchange to Court re same	500.00	0.20	100.00
	LSJ	Review and calendar deadline (entered scheduling order on Kosachuk Motion to withdraw reference)	500.00	0.10	50.00

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			Rate	Hours	
02/19/2025	MSC	Prepare exhibit copies for 2/21/25 hearing	0.00	0.40	0.00
	CBP	Prepared hearing notebooks	0.00	0.50	0.00
02/20/2025	DM	Email pleadings to TM and LJ	0.00	0.10	0.00
	BD	Review and pull Kosachuk AP motion and order denying same (0.1)	0.00	0.10	0.00
	LSJ	Review docket and conference with TM re Kosachuk's purported motion for a continuance which he emailed but which has not appeared on docket	500.00	0.10	50.00
02/21/2025	BD	Prepare Gabbe disbursements and pull wire receipts for TTM (0.5)	0.00	0.50	0.00
	BD	Correspondence to T. Thompson re case update and update mailing address and resend 1099 (0.2)	150.00	0.20	30.00
	LSJ	Travel to to Macon (1.4); prepare for hearing (.5); prepare and attend hearing on Kosachuk contempt (3.0); prepare and attend hearing on Gabbe contempt (1.5); travel from Macon (1.4)	500.00	7.80	3,900.00
02/22/2025	LSJ	Review docket and court updates on hearings held and matters taken under advisement, calendar deadline for post-hearing brief per court authority at hearing	500.00	0.10	50.00
02/25/2025	LSJ	Email exchanges (BK chambers, Kosachuk and TM) re scheduling hearing	500.00	0.10	50.00
	BLS	conf. w/ TM re: drafting brief	0.00	0.10	0.00
02/26/2025	BD	Telephone conference with B Harris re case update and 1099 form (0.1)	150.00	0.10	15.00
	LSJ	Email exchanges (parties and chambers) re scheduling hearing	500.00	0.20	100.00
	LSJ	Review and calendar order setting briefing deadline on discrete issues relating to Trustee's Motion for Contempt against Kosachuk (.1); review entered BK court order on Kosachuk's Motion to Amend Complaint and resetting hearing on same to April 2	500.00	0.20	100.00
02/28/2025	BD	Telephone conference with M. Taylor re case update (0.1)	150.00	0.10	15.00
03/04/2025	LSJ	Prepare response in opposition to Kosachuk motion to withdraw reference	500.00	0.10	50.00
03/05/2025	DM	Edits on Response in opposition to motion to withdraw reference; file and serve and email to Mutepe and Ainsworth	250.00	0.40	100.00
	LSJ	Prepare response to Kosachuk's motion to withdraw reference	500.00	0.40	200.00
03/11/2025	BLS	reviewing documents filed in Kosachuk AP in preparation for drafting brief (.5); legal research on non-party standing to pursue a motion for sanctions (.8); legal research on motions for contempt in APs (1.0)	350.00	2.30	805.00
03/12/2025	BLS	research standing to seek sanctions (.6); conf. w/ TM re: brief (.1); draft brief (3.6); conf. w/ TM re: brief edits (.1)	350.00	4.40	1,540.00
	LSJ	Review minute entry order on docket resetting hearing on contempt motion to April 2	500.00	0.10	50.00

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			Rate	Hours	
03/14/2025	BD	Prepare and send out K-1 tax form to creditors and multiple communications re: creditor status inquiries (2.7)	150.00	2.70	405.00
03/26/2025	BD	Multiple communications with M. Kahey re case update (0.2)	150.00	0.20	30.00
03/27/2025	BD	Multiple communications with creditors L. Simmons, G. Bates, D. Smith, Q. Dopoe, R. Jones, and A. Simmons re return mail, case update, and new mailing address. Resend notice/mail to creditor's new mailing address (1.2)	150.00	1.20	180.00
03/28/2025	BD	Review and update D. Smith's bank info and communications with D. Smith re same (0.1)	150.00	0.10	15.00
	LSJ	Review Kosachuk's Motion for Contempt and to enforce Settlement Agreement, review Kosachuk Motion to Compel Gabbe Deposition (filed in Kosachuk AP), review Kosachuk's Motion to Strike the Trustee's opposition to his Motion to Withdraw the reference in the Kosachuk AP	500.00	0.30	150.00
03/30/2025	LSJ	Review USDC acknowledgement of Motion to Withdraw Reference and Kosachuk's Motion to Strike same, calendar events	500.00	0.10	50.00
03/31/2025	BD	Telephone conference with Creditor re case update (0.1)	150.00	0.10	15.00
04/01/2025	TJV	Revise/finalize, file and serve response to Kosachuk motion for contempt	0.00	0.30	0.00
	BD	Telephone conference with S. Deleston re case update (0.1)	150.00	0.10	15.00
	LSJ	Conference with TM re hearing on Kosachuk Motion to Amend and Response prep (to Kosachuk Motion for Contempt)	500.00	0.10	50.00
04/02/2025	LSJ	Prepare and attend hearing on Kosachuk's Motion to Amend his adversary complaint to add DeCampo, Guernsey, and Red Shield (.7); conference with TM, email exchange (Kosachuk) (.1); telephone conference with Kosachuk re status, conference with TM re Kosachuk position (walk away) (.3); attend courts oral ruling (.5)	500.00	1.60	800.00
04/04/2025	TJV	Finalize, file and serve response to motion to strike in AP	0.00	0.10	0.00
	LSJ	Review and calendar court's Notice of Hearing on Kosachuk's Motion for Contempt (setting May 1 hearing)	500.00	0.10	50.00
04/07/2025	BD	Correspondence to M. Williams and A. Leahong re case update (0.2)	150.00	0.20	30.00
04/08/2025	BD	Telephone conference with B. Harris re case status inquiry (0.1)	150.00	0.10	15.00
	BD	Review main case docket and AP docket for TTM and BLS (0.1)	150.00	0.10	15.00
	BLS	conf. w/ TM re: drafting motion and Rule 11 letter to Kosachuk and begin preparing (.5)	350.00	0.50	175.00
04/09/2025	DM	Finalize rule 11 letter to Kosachuk, email and mail	250.00	0.30	75.00
	BD	Multiple communications with M. Minnis re taxes (0.2)	150.00	0.20	30.00
	BLS	draft rule 11 letter and motion for sanctions (3.2)	350.00	3.20	1,120.00

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			Rate	Hours	
	BLS	answer DM question re: sending rule 11 and motion and conf. w/ TM re: procedural issue (.1); draft motion for vexatious litigant determination (1.1)	350.00	1.20	420.00
04/10/2025	BLS	draft vexatious litigant motion (4.6); conf. w/ TM re: edits and additions to motion (.1)	350.00	4.70	1,645.00
04/11/2025	LSJ	Review and calendar USBC's entered show cause order to attorney Charles Dalziel for failure to represent Gabbe	500.00	0.10	50.00
04/14/2025	BLS	editing vexatious litigant motion (.4); conf. w/ TM re: same (.1)	350.00	0.50	175.00
04/17/2025	LSJ	Review USDC's order denying Kosachuk's Motion to Withdraw Reference	500.00	0.20	100.00
04/22/2025	BD	Correspondences to R. Jones re contact information and J. Ridley re case update (0.2)	150.00	0.20	30.00
04/24/2025	BD	Correspondence to J. Ridley re case update (0.1)	150.00	0.10	15.00
04/29/2025	DM	Review LJ notes, save to file	250.00	0.10	25.00
04/30/2025	LSJ	Review Kosachuk email, conference with TM (proposal from Kosachuk for mutual walk-away) (.1); prepare vexatious litigant order for Kosachuk review (.3 at no charge)	500.00	0.10	50.00
05/01/2025	LSJ	Travel to Macon (1.2); prep and attend hearing on Kosachuk's Motion to Compel (2.7); travel to Atlanta from Court in Macon (1.9)	500.00	5.40	2,700.00
	LSJ	Review order entered by BK judge Carter directing all future filings be made in USDC in respect to Kosachuk's Motion to Withdraw Reference	500.00	0.10	50.00
	BLS	call from TM re: rule 11 research (.1); research rule 11 deadline and call w/ TM re: same (.7)	350.00	0.80	280.00
05/07/2025	BD	Telephone conference with B. Harris re case update and distributions, email B. Harris second and third motion and order to disburse and stipulation (0.5)	150.00	0.50	75.00
05/15/2025	DM	Save LSJ notes	0.00	0.10	0.00
05/21/2025	BD	Correspondence to A. Leahong re case update (0.1)	150.00	0.10	15.00
05/23/2025	BD	Telephone conference with M. Taylor re case update and update contact information (0.1)	150.00	0.10	15.00
05/28/2025	LSJ	Conference with TM re hearing prep (USDC June 3 hearing on Gabbe Appeal)	500.00	0.20	100.00
05/30/2025	LSJ	Review order on Dalziel show cause, calendar June 24 hearing	500.00	0.10	50.00
06/03/2025	BLS	conf. w/ TM re: Gabbe Appeal (.1)	350.00	0.10	35.00

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			Rate	Hours	
06/04/2025	BD	Telephone conference with S. Deleston and M. Williams re update (0.2)	150.00	0.20	30.00
06/05/2025	BD	Telephone conference with B. Harris re case and payments; email re same (0.4)	150.00	0.40	60.00
06/11/2025	LSJ	Review Kosachuk letter to J. Carter requesting to be heard on June 24 relating to Gabbe	500.00	0.10	50.00
06/13/2025	LSJ	Conference with TM re USDC hearing and declaration of damages (on attorney fees) (.2); conference with TM re motion to amend 3rd and final distribution order, analysis re same (.2)	500.00	0.40	200.00
06/16/2025	TJV	Revise TM declaration and prepare/revise J&W attorney fee analysis chart for same	250.00	0.50	125.00
06/17/2025	TJV	Finalize and file TM declaration in Gabbe appeal	250.00	0.40	100.00
06/18/2025	LSJ	Review filed affidavit in USDC in support of damages on sanctions	500.00	0.10	50.00
06/23/2025	LSJ	Email exchange with courtroom deputy (BK court) and Kosachuk re status conference on pending matters	500.00	0.10	50.00
06/27/2025	LSJ	Conference with TM (case closure) and prepare of motion to modify order	500.00	0.10	50.00
07/01/2025	DM	Edits on Motion to Amend Third Disbursement	0.00	0.30	0.00
	LSJ	Prepare motion to amend distribution order (1.2); conference with TM re same (.1)	500.00	1.30	650.00
	TJV	Finalize and file motion to amend distribution order	0.00	0.20	0.00
07/02/2025	MSC	Call with Desiree Jones	250.00	0.20	50.00
07/10/2025	LSJ	Email from Kosachuk to courtroom deputy, calendar July 22 hearing	500.00	0.10	50.00
	BD	Correspondence to D. Deleston re case update (0.1)	150.00	0.10	15.00
07/16/2025	LSJ	Review USDC order dismissing Gabbe appeal and preserving trustee sanctions request against Gabbe	500.00	0.10	50.00
07/21/2025	LSJ	Email exchange TM and chamber (cancellation of July 22 status conference), review docket	500.00	0.10	50.00
07/23/2025	LSJ	Review clerk correspondence to Gabbe notifying Gabbe of the suspension of her attorney Dalziel	500.00		0.00
07/30/2025	BD	Correspondence to A. Leahong re status of case (0.1)	150.00	0.10	15.00
08/06/2025	BD	Correspondence to S. Bain and M. Williams re case status (0.2)	150.00	0.20	30.00
08/07/2025	BD	Correspondence to M. Taylor and B. Walker regarding case update (0.2)	150.00	0.20	30.00

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			Rate	Hours	
08/08/2025	LSJ	Review email and prep suggestion of death (check applicable rules) re Astrid Gabbe	500.00	0.20	100.00
08/10/2025	LSJ	Review entered order holding Kosachuk in contempt and prep re attorney fees (calendar deadline)	500.00	0.50	250.00
	LSJ	Review entered order (denial of Rule 9011 sanctions against Kosachuk), review entered order (deferral of any sanctions on attorney Dalziel due to suspension)	500.00	0.20	100.00
08/11/2025	LSJ	Conference with TM re entered Kosachuk contempt order and prepare needed on fee submission	500.00	0.10	50.00
08/13/2025	TJV	Review Broward Co FL probate records & prepare Gabbe suggestion of death in main BK & Kosachuk AP	250.00	0.40	100.00
	LSJ	Review Court's sua sponte show cause order on Kosachuk, calendar hearing, conference with TM re same	500.00	0.40	200.00
08/15/2025	LSJ	Conference with TM re fee apps and motion to amend final disbursement	500.00	0.50	250.00
	LSJ	Prepare appeal records and research re requirements on same	500.00	0.30	150.00
08/16/2025	LSJ	Prepare final fee app and amendment to final distribution	500.00	0.10	50.00
	LSJ	Review amended order entered by Court on taking judicial notice of death of Gabbe, calendar hearing	500.00	0.10	50.00
08/19/2025	LSJ	Review and calendar entered BK court order setting hearing on Kosachuk Motion to Compel Deposition and Kosachuk request for trial in AP (.1); prepare fee supplement and amendment to order for final distributions (.1)	500.00	0.20	100.00
	EYW	Reconcile accounts; conference with TM and BD re status report preparation	250.00	0.40	100.00
08/20/2025	EYW	Pull x 6125 statements and update file with same (0.1); reconcile x 6125	250.00	0.30	75.00
	LSJ	Prepare supplement to Motion to Amend Final Distributions, prepare order on same, review trustee's professional for requests (.8); prepare supplement in support of fee award for Kosachuk contempt (.3)	500.00	1.10	550.00
08/21/2025	DM	Prepare edits on supplements and order	250.00	0.40	100.00
	EYW	Conf with BD and TM re status reports	250.00	0.20	50.00
	LSJ	Conference with TM re developing of prosecution of final distributions (.3); revise pleadings (.3); further conference with TM re closing trustee and pleadings re same (.3)	500.00	0.90	450.00
08/22/2025	LSJ	Conference with TM re hearing and strategy, email to Kosachuk	500.00	0.20	100.00
08/23/2025	LSJ	Review and calendar court's Notice of Hearing on Kosachuk's (a) Motion to Compel Deposit and (b) his request for trial date	500.00	0.20	100.00
		For Current Services Rendered		255.00	73,837.50

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Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Leon S. Jones	0.20	\$0.00	\$0.00
Leon S. Jones	70.00	475.00	33,250.00
Leon S. Jones	27.10	500.00	13,550.00
Tessa Vuncannon	3.20	0.00	0.00
Tessa Vuncannon	17.40	200.00	3,480.00
Tessa Vuncannon	3.40	250.00	850.00
Megan Cypher	0.50	0.00	0.00
Megan Cypher	0.30	200.00	60.00
Megan Cypher	0.30	250.00	75.00
Carson Parker	0.50	0.00	0.00
Ellen Wooden	0.40	0.00	0.00
Ellen Wooden	6.10	200.00	1,220.00
Ellen Wooden	1.50	250.00	375.00
Daniela Manzo	3.30	0.00	0.00
Daniela Manzo	1.80	200.00	360.00
Daniela Manzo	1.20	250.00	300.00
Blake Dernus	29.60	0.00	0.00
Blake Dernus	33.10	150.00	4,965.00
Mark D. Gensburg	0.90	375.00	337.50
Bethany L. Strain	0.10	0.00	0.00
Bethany L. Strain	27.10	300.00	8,130.00
Bethany L. Strain	17.70	350.00	6,195.00
William Gooding	7.00	0.00	0.00
William Gooding	2.30	300.00	690.00

Expenses

04/12/2024	Postage (62 @ .64)	39.68
04/19/2024	Federal Express	43.75
04/25/2024	Postage (71 @ .88)	62.48
04/26/2024	Postage (82 @ 2.83)	232.06
04/26/2024	Photocopy charges - 3rd Distribution Motion	582.20
05/01/2024	Fee for Online Court Documents (PACER)	19.40
05/03/2024	Postage	0.64
05/03/2024	Postage	1.39
05/06/2024	Postage	0.64
05/09/2024	Postage	0.64
05/10/2024	Postage	0.64
05/21/2024	Postage (4 @ .64)	2.56
05/28/2024	Federal Express	32.33
05/28/2024	Federal Express	45.40
05/31/2024	Fee for Online Court Documents (PACER)	34.00
05/31/2024	Online legal research	87.00
06/10/2024	Postage	0.64
06/17/2024	Postage	2.35
06/17/2024	Postage	1.63
06/17/2024	Postage (3 @ 1.87)	5.61
06/21/2024	Mileage to/from Macon for hearing	116.58
06/21/2024	Parking	6.50
06/30/2024	Fee for Online Court Documents (PACER)	44.10
06/30/2024	Online legal research	159.00

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07/02/2024	Postage	0.64
07/03/2024	Federal Express	47.99
07/12/2024	Federal Express	19.29
07/18/2024	Postage	0.69
07/19/2024	Federal Express	28.28
07/22/2024	Postage	1.50
07/22/2024	Postage (2 @ .69)	1.38
08/08/2024	Postage (2 @ .97)	1.94
08/09/2024	Postage	0.69
08/12/2024	Postage (2 @ .69)	1.38
08/14/2024	Postage	0.69
08/27/2024	Federal Express	45.82
08/31/2024	Fee for Online Court Documents (PACER)	112.30
08/31/2024	Online legal research	371.03
09/09/2024	Postage	1.25
09/09/2024	Postage	0.97
02/01/2025	Online legal research	275.25
04/01/2025	Postage	0.69
04/04/2025	Postage	0.69
04/09/2025	Postage	1.77
05/01/2025	Fee for Online Court Documents (PACER)	5.70
05/01/2025	Online legal research	336.75
	Total Expenses	2,777.91
	Total Current Work	76,615.41